

Donohue

CLOSURE PLAN C.I.D. LANDFILL

Chemical Waste Division
of Waste Management of Illinois, Inc.

Donohue & Associates, Inc.
Engineers & Architects

EPA Region 5 Records Ctr.



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CLOSURE PLAN
C.I.D. LANDFILL
WASTE MANAGEMENT, INC.
CALUMET CITY, ILLINOIS

DATE: May 19, 1981
(Donohue & Assoc., Inc.)

REVISIONS: April, 1982 (W.M.I.)
May, 1982 (W.M.I.)

PART I - IDENTIFICATION

A. <u>Name of Site</u>	C.I.D. - Chemical Waste Management of Illinois
B. <u>Address of Site</u>	P.O. Box 1306 138th and Calumet Expressway Calumet City, Illinois 60409
C. <u>Owner and Operator of Site</u>	Chemical Waste Division of Waste Management of Illinois, Inc. 900 Jorie Boulevard Oak Brook, Illinois 60521 Phone: (312) 654-8800
D. <u>U.S. EPA Facility ID Number</u>	F ILD010284248 D

PART II - FACILITY CONDITIONS

A. General Information

1. Site area: Total site is 400 acres (See Figure 1, Appendix A)

2. Depth of fill:

3. Operation:

Hazardous chemical waste is codisposed with refuse. Current operations limit the addition of liquid waste or sludge to 16 gallons per cubic yard of refuse. This limit is well within the absorptive capacity of refuse. Refer to Part A of the application of an EPA hazardous waste permit for a listing of hazardous wastes being accepted at the site.

4. Subsoil:

Soil borings have indicated silty clay soil below the site down to dolomite bedrock generally at an 80 to 85 foot depth. The clay subsoil has an estimated hydraulic coefficient of permeability of 5×10^7 to 5×10^8 cm/sec. Excavations at the site leave at least 20 feet of clay between bedrock and the bottom of the landfill in Disposal Area No. 3 and at least 45 feet in Disposal Areas No. 1 and No. 2.

5. Leachate collection:

- a. No leachate collection system was included in the original design and permit for the C.I.D. landfill. Wells or drain tile are to be installed for leachate removal only if the liquid level rises above elevation 584 mean sea level. Thus far, perforated drain tile has been installed only along the west half of the north and south boundaries of Disposal Area No. 1. The leachate drains to be a 26,000 gallon storage tank near the northwest corner of Disposal Area No. 1. Approximately 13,000 gallons/day of leachate is pumped from the storage tanks and hauled by tank truck to the active area in Disposal Area No. 3.
- b. A leachate collection system will be constructed for the areas in Disposal Area No. 3 receiving hazardous waste after November 19, 1981. The collection system will be provided in accordance with federal regulations for hazardous waste landfills and will consist of perforated drain tile situated at the base of the landfill.
- c. Leachate will continue to be disposed of directly with refuse in the active area of Disposal Area No. 3 until other arrangements are made. Application is being made to the Metropolitan Sanitary District of Greater Chicago to be able to discharge to the sanitary sewer system. If the application is accepted, leachate will be passed through the dewatering system with the filtrate being discharged to the sanitary sewer system.

6. Gas collection:

Currently, the C.I.D. landfill site has 17 gas flares, situated in area 3. It is intended that the majority of the gas flares will be converted to gas extraction wells. Gas is collected by a header system from Disposal Areas No. 1, No. 2 and refined for retain sale.

7. NPDES permit:

The C.I.D. site has a NPDES permit (No. IL0061107) for controlled discharge from a retention pond that receives surface runoff from the sludge drying areas. This permit is necessary only during active sludge drying operations. The permit will be terminated upon closure of the site.

8. Other facilities:

In addition to the landfill, the following facilities are provided at the C.I.D. site: acid neutralization and chemical fixation (pug mill) system, aqueous waste dewatering (vacuum filter) system, drum tipping system, drummed waste transfer area, landfill methane recovery system, and sludge drying beds. Filtrate from the dewatering system is discharged to the Metropolitan Sanitary District of Greater Chicago sanitary sewer system. The methane recovery system is not included under the closure and post-closure procedures because it is not a hazardous waste facility. The sludge drying beds accept only sludge from publicly owned treatment works (POTW) that is not classified as hazardous waste. The sludge drying operations are addressed only as they relate to closure of the hazardous waste facilities.

B. Waste Inventory

1. Acid neutralization system:

Pickle liquor is stored in two lagoons which have a capacity of 660,000 gallons. The maximum quantity of neutralized waste held for disposal in the C.I.D. landfill at any time is 515,000 gallons.

2. Dewatering system:

Acidic and alkaline heavy metal wastes are stored in two lagoons which have a capacity of 540,000 gallons. The maximum quantity of dewatered waste held for disposal in the C.I.D. landfill at any time is 1,500 gallons.

3. Drum tipping system:

Certain hazardous wastes are brought to the C.I.D. site in 55-gallon drums for codisposal with refuse in the landfill. The drum tipping system empties the drums and transfers the waste to a tank truck which hauls it to the active disposal area of the landfill. A maximum of 160 drums (8,800 gallons) would be on-site at any time for processing at the drum tipping station.

4. Drummed waste transfer area:

The drummed waste transfer area is used for wastes brought to the C.I.D site for temporary storage. Waste is collected from industrial customers in 55-gallon drums and held at the site until a sufficient quantity accumulates to permit economical transportation off-site to a permitted/approved hazardous waste site for ultimate disposal. An average of 200 drums (11,000 gallons) would be present at any time in the transfer area.

C. Partial Closures

Disposal Areas No. 1 and No. 2, which include 150 acres, are filled to the heights currently approved by state and local regulatory authorities. Three feet of final cover has been placed over the entire area. The areas are now being used for sludge drying operations. The sludge drying operations cease.

Disposal Area No. 3 has approximately 173 acres of potential landfill area. Currently, the maximum active landfill area at any given time is 16 acres. Portions of Disposal Area No. 3 will be filled to licensed heights and covered with four feet of clay, six inches of topsoil and revegetated.

D. Final Closure

The following approximate operating and closure schedule is anticipated for the C.I.D. facility (subject to revision as the site fills and/or waste quantities change):

- | | |
|--|------------------|
| 1. Receive final waste for Disposal Area No. 3
(entire area north of 134th Street) - | April 15, 1993 |
| Use of the sludge drying beds in Disposal Area No. 3 will end as the active fill area progresses eastward. | |
| 2. Dispose of final waste in Disposal Area No. 3 - | April 15, 1993 |
| 3. Place final cover in Disposal Area No. 3
(16 acres) - | May 15, 1993 |
| 4. End sludge drying operations on previously
filled Disposal Areas No. 1 and No. 2 - | May 15, 1993 |
| 5. Plant final vegetation on Disposal Areas No. 1
and No. 2 - | June 15, 1993 |
| 6. Plant final vegetation in Disposal Area No. 3 - | June 15, 1993 |
| 7. Complete closure of Disposal Areas No. 1, No. 2,
and No. 3 - | October 15, 1993 |

8. Complete monitoring system modifications as discussed in Part VII - October 15, 1993
9. Operation of the treatment facilities discussed previously will continue for an undetermined period of time, depending on markets and the need for these facilities. Future landfilling may occur south of 134th Street if additional land is purchased from the Metropolitan Sanitary District. If future landfilling is not performed south of 134th Street, the treatment facilities would be closed to accommodate the schedule for Disposal Area No. 3. In this case, the acid neutralization system, dewatering system, and drum tipping system would be closed as indicated below.
10. Receive final waste for treatment and tipping facilities - February 1, 1993
11. Complete treatment and tipping of wastes (dispose of in Disposal Area No. 3) - March 15, 1993
12. Complete decontamination of treatment facilities - April 15, 1993
13. Place final cover over treatment facility area - May 15, 1993
14. Plant final vegetation over treatment facility area - May 15, 1993

No specific closure schedule for the drummed waste transfer area can be predicted. The transfer system will be in operation as long as there is a sufficient number of customers to justify offering the service. Equipment and facilities will be inspected, repaired, or replaced as necessary to maintain safe and efficient operation of the transfer system as part of normal operating procedures.

E. Mobile Equipment

Sufficient mobile equipment is available at the site to carry out the closure plan. Included in the equipment inventory are a dragline, loaders, dozers, wheeled compactors, dump trucks, a grader, a tractor, and a spreader for seed and fertilizer.

PART III - MAINTENANCE OF PARTIALLY CLOSED AREAS

A. General

Partially closed Disposal Areas No. 1 and No. 2, as well as the portion of Disposal Area No. 3 that is filled to the licensed height, will be properly maintained throughout the active life of the site. Maintenance of partially closed areas is considered to be an integral part of the daily operation of the site. Procedures to be followed for closure are discussed later in this plan.

B. Cover and Vegetation

The filled areas will be inspected monthly to ensure the cover and vegetation are intact. Any depressions forming from differential settlement will be filled with clean fill. Areas of erosion will be repaired. The areas will be reseeded and fertilized as necessary to maintain the final cover.

C. Leachate and Gas Collection

Leachate will continue to be collected and disposed of as discussed previously. Gas extraction wells throughout the site will continue to be maintained.

D. Groundwater Monitoring

A groundwater monitoring program will be carried out for the overall site in accordance with state and federal regulations. Quarterly monitoring of certain parameters will continue throughout the active life of the site. A discussion of the present and future groundwater monitoring programs is presented later in this plan and in the post-closure plan.

PART IV - TREATING, DISPOSING, OR REMOVING ALL INVENTORY

A. General

The maximum inventory of waste anticipated on-site at any time is discussed in Part II. All inventory (other than the drummed waste transfer area inventory) will be treated and disposed of on-site prior to final closure of the landfill. Estimated costs for treating, disposing, or removing all inventory are presented in Table 1 (Appendix B).

B. Treatment

1. Acid neutralization system

The acid neutralization system currently processes approximately 85,000 gallons per day of waste. The maximum waste inventory of 660,000 gallons could therefore be processed within seven to eight days.

2. Dewatering system:

The dewatering system currently processes approximately 25,000 gallons per day of waste. The maximum waste inventory of 540,000 gallons could therefore be processed within 21 to 22 days. Any remaining contents in the 12,000 gallon concrete reaction tank, the two 1,500 gallon pH control tanks, and the 6,000 gallon concentrated acid tank will be neutralized prior to disposal. Any remaining contents in the lime storage silos will be land-filled or hauled away for use at another site.

C. Disposal

1. Any inventory of neutralized or dewatered waste; any neutralized contents in the reaction tank, pH control tanks, or concentrated acid tank; and any inventory associated with the drum tipping operation will be codisposed with refuse in the landfill. The maximum total inventory requiring on-site disposal is approximately 1,200,000 gallons. Codisposal is normally practiced in a ratio of 16 gallons maximum treated or liquid waste to one cubic yard refuse. Based on this ratio, approximately 75,000 cubic yards of refuse would be required to dispose of the maximum inventory. An average of 25,000 cubic yards/day of refuse are currently disposed of at the C.I.D. landfill. The maximum inventory of hazardous wastes could therefore be codisposed in more than three operating days' refuse. A wheel-type loader, dump truck, container truck, and tank truck would be required to transfer the treated wastes to disposal.

2. Any inventory of chemicals in the laboratory will either be removed for use at another Waste Management, Inc., site or disposed of in the C.I.D. landfill.

D. Removal

Any inventory of waste in the drummed waste transfer area will be removed from the site upon closure of the transfer facility. All drums will be loaded by a forklift and hauled by truck for disposal at a permitted/approved hazardous waste disposal site. The average inventory of 200 drums could be hauled in 3 truck loads to the disposal site. All of the transport operations will be in accordance with U.S. Department of Transportation rules and regulations and the U.S. Environmental Protection Agency manifest forms.

PART V - DECONTAMINATION

A. General

Certain equipment and facilities will be decontaminated prior to final closure. The procedures to be used are discussed below. Estimated costs for decontamination are presented in Table 2 (Appendix B).

B. Treatment Facility Equipment

1. The pH control tanks, concentrated acid tank, pug mill, drum tipping mechanism, and pumps or piping may be removed, they will first be decontaminated according to proper procedures. Equipment will not be decontaminated if it is disposed of on-site in accordance with approved procedures for hazardous waste.
2. The equipment will be thoroughly rinsed to remove chemical liquid or sludge. The clean-up operation will be performed by a private contractor or Waste Management, Inc., personnel experienced in the proper cleaning of hazardous waste facilities. After the types of waste handled by each item of equipment have been reviewed, an appropriate cleaning solution will be determined.
3. Up to 7,500 gallons of cleaning and rinsing water will result from decontaminating the equipment. The contaminated water will be loaded into tank trucks and disposed of in the active area of the C.I.D. landfill.
4. The decontaminated equipment will either be sold or moved to another Waste Management, Inc., site for future use.

C. Mobile Equipment

1. Various types of mobile equipment are used for the C.I.D. facility operation. Because some of this equipment comes in contact with hazardous waste, it will be decontaminated prior to removing it from the site. Equipment anticipated to require decontamination may include four dozers, one loader, three compactors, one tank truck, four dump trucks, and two 7 cubic yard containers.
2. Contaminated buckets, wheels, bodies, and containers will be decontaminated with appropriate solutions. Up to 6,000 gallons of cleaning and rinsing water will be used. the contaminated water will be loaded into tank trucks and either disposed of in the C.I.D. landfill or transported to another permitted/approved hazardous waste site for disposal.

D. Site

1. The C.I.D. facility will be operated in a manner that will minimize contamination of areas outside the active disposal area. Any hazardous waste spills will be cleaned up when they occur. Upon closure, final cover will be placed, and vegetation will be planted over the area of the treatment facility. No decontamination will be required in this area.

2. When it is closed, some contamination concrete and soil will remain in the area of the treatment facility previously used for waste disposal. Rather than remove contaminated soil and clean contamination concrete, the treatment facility area will be covered with at least an additional two feet of final cover. The procedures for placement of final cover and planting of vegetation are discussed in Part VI.
3. The storage lagoons are constructed with an effective liner. The four storage lagoons used in conjunction with the neutralization and dewatering systems are surrounded with a compacted clay liner. Upon closure of the facility, they will be filled in and covered over with final cover and vegetation as discussed previously for the general treatment facility area.

Part VI - COVER AND VEGETATION

A. General

All of the areas previously used for disposal will be covered with three feet of compacted, fine textured, impervious earth, sloped adequately to provide surface water runoff. Top slopes will be five percent, and side slopes will be constructed at 3:1. However, with subsidence, the actual side slopes will probably be closer to 4:1. As final covering for the site, six inches of topsoil/sludge will be placed over the cover soil to provide a suitable growth medium for vegetation. All topsoiled areas will be fertilized and seeded to establish a dense vegetative growth. Estimated costs for final cover and vegetation are presented in Tables 3 and 4 (Appendix B).

B. Final Cover

1. Disposal Areas No. 1 and No. 2 currently have three feet of impervious cover material placed over the entire surface area (150 acres).
2. The maximum active landfill area at any given time in Disposal Area No. 3 is 16 acres. Disposal Area No. 3 consists of 173 acres. As disposal areas in Area No. 3 reach final grades, four feet of final cover will be placed over the area.
3. A four-foot layer of fine textured soil will be used for cover material in Disposal Area No. 3. The minimum specification for cover soils is 50 percent fines passing a No. 200 sieve and an estimated in-place hydraulic permeability of 10^7 centimeters per second (cm/sec). A minimum of six inches of topsoil will be placed over the cover soil. Dried sludge mixed with clay will be used as topsoil over the entire site. Since the disposal areas are used for sludge drying, actual placement of topsoil will consist of leaving six inches of sludge.
4. Disposal Area No. 3 will require 124,000 cubic yards of cover material and 15,500 cubic yards of topsoil/sludge maximum at any given time.
5. Final cover material and topsoil (dried sludge and clay mixture) are available on-site. At closure the approximate haul distance for the cover material will average 2,000 feet.
6. Disposal Areas No. 1 and No. 2 are filled to the heights currently licensed by the state and local regulatory agencies. Final surface elevations are indicated on the final grading plans approved by the regulatory agencies. Top slopes will be 5 percent, and side slopes will be constructed at 3:1. Portions of Disposal Area No. 3 filled to final grades will be sloped as indicated in the approved plans. The 16 acres which are active at any given time will be sloped to a minimum of 5 percent on top and no more than 33 percent side slopes.

7. C.I.D. personnel will haul and place the final cover material and topsoil/sludge. Sufficient earthmoving equipment is available at the site to construct the final cover.

C. Vegetation

1. To establish the vegetative growth, all properly abandoned landfill areas will be seeded with native grasses and culched within 90 days after ceasing to accept waste. Disposal Areas No. 1 and No. 2 will require vegetation following the removal of dried sludge. This area consists of 150 acres. Disposal Area No. 3 will also require vegetation. This active area consists of a maximum of 16 acres at any time.
2. Several species of grasses are best suited for seeding new areas. Table A presents a recommended plan for seeding. This seeding mixture is generally used in rural areas and for slopes. A mechanical seeder is best suited for slopes. A mechanical seeder is available on-site. Approximately 16 tons of seed will be required for Disposal Areas No. 1 and No. 2, while Disposal Area No. 3 will require a maximum of 2 tons.
3. All topsoiled areas should normally be fertilized prior to seeding. One broadcast application of fertilizer is recommended to initiate the growth of grasses. Since dried sludge will be utilized as topsoil, the application of fertilizer is not required at the C.I.D. landfill. However, the dried sludge should be worked into the cover material approximately three inches. Once the seeded vegetation reaches maturity, the fully developed root systems can sustain future growth.
4. The last step in establishing a dense vegetative growth is to uniformly mulch the area. Mulching protects the seeds from adverse weather conditions and minimizes erosion by water or wind during seed germination. In large areas, a mixture of oats with the seeds as mulching is more practical. Normally, one bushel of oats per acre is suitable. Disposal Area No. 1 and No. 2 will require 150 bushels of oats, and Disposal Area No. 3 will require 16 bushels of oats.

TABLE A
SEEDING MIXTURE AND APPLICATION RATES
C.I.D. LANDFILL
Waste Management, Inc.

<u>Species</u>	<u>Percent in Mixture</u>
Kentucky 31 Fescue	73
Creeping Red Fescue	17
Red Top	5
Perennial Ryegrass	5

Application Rates

Seeding: 215 lbs/acre
Mulching Material: 1 bushel of oats/acre (included with seeding mixture)

PART VII - GROUNDWATER MONITORING

A. General

Part VII discusses the groundwater monitoring program to be carried out during site closure. Also discussed are actions to be taken in preparation of the post-closure program. The post-closure plan discusses the groundwater monitoring program to be carried out after the C.I.D. site is closed. Estimated costs for ground monitoring during closure are presented in Table 5 (Appendix B).

B. Monitoring During Closure

1. The existing groundwater monitoring program includes quarterly analysis of groundwater for the following parameters: chemical oxygen demand (COD), chloride, chromium, cyanide, iron, lead, mercury, sulfate and residue on evaporation (R.O.E.) at 180° C. Federal regulations require that the following parameters be added to the monitoring program: manganese, phenols, sodium, pH, specific conductance, total organic carbon, and total organic halogen. The above parameters as well as the groundwater surface elevation will be monitored quarterly during closure.
2. The monitoring will be performed at five monitoring wells, two upgradient and three downgradient (see Figure 2, Appendix A).

C. Maintenance of Monitoring Equipment

1. The monitoring wells will be inspected for any damage at the same time as samples are taken. Any damage will be repaired.
2. All inspection, monitoring, replacement, and repair of the monitoring wells will be conducted by Waste Management, Inc., personnel.

D. Preparation for Post-Closure

1. This section discusses the efforts to be performed prior to final closure. A discussion of the reasons for these efforts is provided in the post-closure plan, Part II - Groundwater Monitoring.
2. The integrity of the impermeable clay strata below the C.I.D. landfill is the chief mechanism preventing significant movement of degraded water from the landfill. The existence of observation wells and borings through the clay strata provides direct vertical access to the underlying aquifer. Upon closure, all wells on-site, except those to be used for the long term post-closure monitoring program, will be abandoned and sealed. Table 5 of Appendix B contains cost estimates for abandonment and sealed. Table 5 of Appendix B contains cost estimates for abandonment of the wells.
3. The riser pipes will be removed and the holes backfilled with a cement/bentonite grout mixture. A grout pump will pump grout through a tremie pipe incrementally withdrawn to assure complete backfilling to grade.

PART VIII - CLOSURE CERTIFICATION

- A. A professional engineer must inspect the site periodically during closure to certify that site is closed as outlined in this plan. Following abandonment, certain tests will be conducted to ensure that the three-foot final cover material has been properly placed.
- B. One depth test and one gradation test will be performed for a predetermined landfill surface area (e.g., every 150,000 square feet), and one in-field permeability test will be performed for larger surface areas (e.g., every 600,000 square feet). Specific locations of these tests will be evenly distributed over the surface area of the landfill site.
- C. Elevation and coordinates will be recorded for each of the in-place test sites. Record drawings certifying that the abandonment has been completed according to the closure plan will be prepared and sealed by a registered professional engineer.
- D. Notice to the local land authority will be made 90 days after closure. A survey plat indicating the location and dimensions of the disposal areas referenced to permanently surveyed benchmarks will be filed with the local land authority. The plat will be prepared and certified by a professional land surveyor.
- E. A notation on the deed to the facility property will notify any potential purchaser of the property that: (1) the land has been used to manage and dispose of hazardous waste, (2) its use is restricted as per post-closure care and use of the site, and (3) the survey plat and record of the type, location, and quantity of the hazardous waste disposed of on the site, is on file with the local land authority.
- F. Estimated costs for closure certification are presented in Table 6 (Appendix B).

PART IX - COLLECTING, REMOVING, AND TREATING LEACHATE

A. General

Part IX discusses the methodology for collecting, removing, and treating leachate during the period of closure at the C.I.D. landfill. Estimated costs for collecting, removing, and treating leachate are in Table 7 (Appendix B).

B. Quantities of Leachate

The leachate collection system in Disposal Area No. 1 currently drains 20,000 gallons per day (gpd) of leachate. Disposal Area No. 2 does not and will not have a leachate collection system. For Disposal Area No. 3, a leachate collection system will be constructed for the areas that receive a hazardous waste after November 19, 1981. the assumption for cost estimating is that the entire Disposal Area No. 3 will be drained by a leachate collection system.

Tables B and C present water budgets for the two slope conditions at the site, i.e., top slopes of 5 percent and side slopes of 25 percent. Approximately 87 acres of Disposal Area No. 3 will have a 5 percent slope while 58 acres will be sloped at 25 percent. The results of the water balance indicates that the top slope will have an average percolation rate of 1.4 inches/year, and the side slopes will not have a percolation rate. This results in an estimated quantity of leachate of 10,900 gpd collected from Disposal Area No. 3.

The estimated quantity of leachate represents only precolation of precipitation and does not include groundwater interception. The volume of groundwater being intercepted by the leachate collection system is considered to be negligible because of the following factors:

1. The clay soils are rather impermeable.
2. The regional groundwater table is essentially horizontal.
3. The penetration of the leachate maintenance level is minimal. (EL 584)

Calculation

$$\begin{array}{l} \text{TOP:} \\ 1.4 \text{ inches/year} \times 87 \text{ acres} \times \frac{43,560 \text{ sq ft}}{\text{area}} \times \frac{7.48 \text{ gallon}}{\text{cu ft}} \times \frac{\text{ft}}{12 \text{ in}} \times \frac{\text{year}}{365 \text{ days}} = 9,100 \text{ gpd} \end{array}$$

$$\begin{array}{l} \text{SIDE:} \\ 0.0 \text{ inches/year} \times 58 \text{ acres} \times \frac{43,560 \text{ sq ft}}{\text{area}} \times \frac{7.48 \text{ gallon}}{\text{cu ft}} \times \frac{\text{ft}}{12 \text{ in}} \times \frac{\text{year}}{365 \text{ days}} = \underline{-0-} \text{ gpd} \end{array}$$

$$\begin{array}{lcl} \text{TOTAL} & 145 \text{ acres} & 9,100 \text{ gpd} \end{array}$$

PART X - GAS COLLECTION

- A. Disposal Area No. 1 & 2 currently has an operational gas collection and refining system operating. Gas is collected at the perimeter of Disposal Areas No. 3 and flared. Gas extraction wells induce gas collection.
- B. Gas extraction wells were installed at the toe of the disposal areas to monitor the potential for the migration of gases produced by the refuse deposited in the excavated portion of the fill area and to flare off greater quantities of the methane gas.
- C. The physical condition of the gas extraction wells will be checked by the gas extraction contractor. The gas extraction wells will be repaired and replaced by the contractor when the need is determined.
- D. Monitoring, sampling, replacement, and repair of the wells is to be accomplished by gas extraction contractor.

PART XI - MAINTAINING THE FENCE

- A. A chain link fence is in place around the treatment facility and drum transfer areas. A portion of the perimeter of the remainder of the C.I.D. site has a woven wire fence with barbed wire top.
- B. The site perimeter fencing will be inspected at the time of final closure. Any damaged or weakened areas will be repaired at that time.
- C. Estimated costs for installing and maintaining the fence are in Table 8 of Appendix B.